

641-07/MEU

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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VOYAGER SHIPHOLDING CORP.,

Plaintiff,

-against-

HANJIN SHIPPING CO. LTD.,

Defendant.
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07 CV 111233 (GEL)

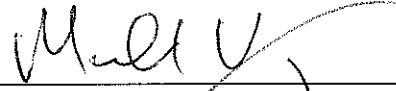
NOTICE OF MOTION

PLEASE TAKE NOTICE that upon the Affidavit of Michael E. Unger, sworn to on December 21, 2007, and the accompanying Memorandum of Law in Support, and all pleadings heretofore had in this matter, Defendant HANJIN SHIPPING CO. LTD. will move this Court, before the Honorable Gerard E. Lynch, United States District Judge, at 500 Pearl Street, Courtroom 6B, New York, New York, on the ____ day of January, 2008, at ____ o'clock, or as soon thereafter as counsel can be heard, for an order pursuant to Rule E(7) of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions: (a) directing that Plaintiff VOYAGER SHIPHOLDING CORP. give security to the Defendant for the damages demanded in the counterclaims within 10 days from the issuance of the order; (b) staying further proceeding in Plaintiff's prosecution of its claims in the original action; (c) directing that the Verified Complaint be dismissed and the attachment of Defendant's property made in this action be vacated if the ordered security is not provided within 10 days from the issuance of the order; and

(d) directing such other and further relief as the Court may deem proper.

Dated: New York, New York
December 21, 2007

FREEHILL, HOGAN & MAHAR, LLP
Attorneys for Defendant
HANJIN SHIPPING CO. LTD.

By: 
Michael E. Unger (MU-0045)
80 Pine Street
New York, NY 10005-1759
Telephone: 212 425-1900
Facsimile: 212 425-1901

TO: LENNON MURPHY & LENNON, LLC
Attorneys for Plaintiff
420 Lexington Avenue, Suite 300
New York, New York 10170
Attn: Patrick F. Lennon, Esq.
Nancy R. Peterson, Esq.